
Brandon Callier
Plaintiff, Pro Se

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

BRANDON CALLIER,

Plaintiff,

v.

**UNITED DEBT SETTLEMENT, LLC a New
York Limited Liability Company, and MARCEL
BLUVSTEIN**

Defendants.

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EP-20-CV-0289

**AFFIDAVIT IN SUPPORT OF REQUEST FOR DEFAULT JUDGMENT FOR SUM
CEERTAIN and STATEMENT OF AMOUNT DUE**

I, Brandon Callier, being duly sworn, state as follows:

1. I am the Plaintiff, Pro Se, in the above-entitled action and I am familiar with the file, records, and pleadings in this matter.
2. The amount due in this action is:
 - a. \$1500 in statutory treble damages for each of 14 willful and knowing § 227(b) violations pursuant to 47 U.S.C. § 227(b)(3)(B); and
 - b. \$1500 in statutory treble damages for each of 14 willful and knowing § 227(c) violations pursuant to 47 U.S.C. § 227(c)(5)(B); and
 - c. \$500 in statutory damages for each of three § 227(b) violations pursuant to 47 U.S.C. § 227(b)(3)(B); and
 - d. \$500 in statutory damages for each of three § 227(c) violations pursuant to 47 U.S.C. § 227(c)(5)(B).

For a total of \$45,000.00
3. This action was filed on or about November 23, 2020. Proof of service documents duly filed in the docket of this case show that the defendants were served with the Summons and Complaint in this action more than twenty (20) days ago, that defendants are not in military service, or an infant or incompetent.

4. Defendants did not answer or otherwise appear in the above-entitled action and time to do so has lapsed.
5. Defendant Marcel Bluvstein is the owner of Defendant United Debt Settlement, LLC.
6. Plaintiff Callier sued Defendant United Debt Settlement, Cause number EP-20-CV-0235, on September 3, 2020.
7. Defendant United Debt Settlement was duly served this complaint on September 14, 2020.
8. From September 14, 2020 forward Defendants were on notice Plaintiff did not want their unsolicited robocalls and robotexts.
9. From September 23, 2020 to November 12, 2020 Defendants sent Plaintiff 14 robocalls and robotexts.
10. Each and every call and text message from September 23, 2020 to November 12, 2020 were knowing and willful Telephone Consumer Protection Act violations subject to treble damages.
11. From September 1, 2020 to September 11, 2020 Defendants called Plaintiff three times with phone calls that were not included in Cause number EP-20-CV-0235.
12. Pursuant to Federal Rule 55(a) of the Federal Rules of Civil Procedure, the Clerk of the Court entered a Certificate of the Entry of Default against the Defendants United Debt Settlement and Marcel Bluvstein on January 6, 2021.
13. Upon information and belief, the amount due of \$45,000 is justly due and owing and no part thereof has been paid except as herein set forth.
14. The disbursements set forth in this affidavit and sought to be taxed have been made in the action or will necessarily be made or incurred therein.

Dated January 4, 2021

Sworn to and subscribed before

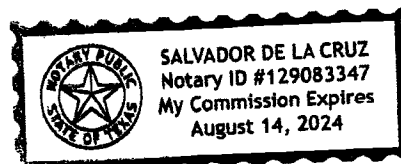
Me this 06 day of JANUARY,
2021.

[Signature]
Notary Public

My Commission Expires: 08/14/2024

[Signature]

Brandon Callier
Plaintiff, Pro-se



CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY
DEPUTY CLERK

[illegible]

JUDGMENT ENTERED THIS _____ DAY OF _____, 2021.

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
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EP-20-CV-0289

CERTIFICATE OF SERVICE

I, Brandon Callier, certify that on this date I caused a copy of the Request for Entry of Default Judgement For Sum Certain, Affidavit In Support of Request For Default Judgement For Sum Certain and Statement of Amount Due, and Proposed Judgment For Sum Certain By Default to be placed in a postage paid envelope addressed to Defendant United Debt Settlement, LLC's registered agent United States Corporation Agents Inc., 7014 13th Avenue, Suite 202, Brooklyn, New York 11228, and to Defendant Marcel Bluvstein at 241 West 30th Street, 3rd Floor, New York, New York 10001, the last known address of Defendant Bluvstein.

Dated January 7, 2021



Brandon Callier
Plaintiff, Pro-se

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EP-20-CV-0289

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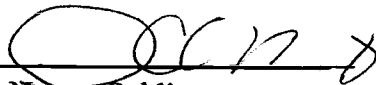
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Dated January 4, 2021

Sworn to and subscribed before

Me this 06 day of JANUARY,
2021.



Notary Public

My Commission Expires: 08/14/2024



Brandon Callier
Plaintiff, Pro-se

